

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE:

PATSY R. CANNON,

DEBTOR.

**Case No.: BK-16-10932-JDL
Chapter 13**

SUPPLEMENTAL RESPONSE TO OBJECTION TO MOTGAGE PAYMENT CHANGE

Comes now the secured creditor, INTERNATIONAL BANK OF COMMERCE, by their attorney, Baer & Timberlake, P.C., and supplements its Response to Objection to Notice of Mortgage Payment Change filed by Debtor on January 23, 2017 (Document Numbers 26 and 32):

INTERNATIONAL BANK OF COMMERCE has researched the payment increase and has determined that, while the principal & interest, taxes and insurance amounts in the escrow analysis and the objection are the same, the issue becomes the escrow shortage. An escrow shortage of \$3,161.96 was calculated for the upcoming year (which was divided in to 12 installments of \$263.50 to be added to the payment). It is unknown how debtor intends to address this escrow shortage, but it is creditor's position and belief that the escrow advance is real and significant. This escrow shortage is the one issue of contention.

WHEREFORE, PREMISES CONSIDERED, INTERNATIONAL BANK OF COMMERCE prays this Court deny the Objection to Mortgage Payment Change; and for such further relief as this Court deems appropriate.

INTERNATIONAL BANK OF COMMERCE,

By: s/ Matthew J. Hudspeth
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Attorney for Movant

CERTIFICATE OF SERVICE

I hereby certify that I mailed a true and correct copy of the above and foregoing Response with postage thereon fully prepaid to the parties listed below on April 26, 2016.

Patsy R Cannon
5712 North Terry Avenue
Oklahoma City, OK 73111

The following persons should have received notice of the above and foregoing instrument on the same day it was filed by the Court's CM/ECF Electronic Noticing System.

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